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STATE OF WASHINGTON  
DEPARTMENT OF ECOLOGY

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June 7, 2000

Mr. Richard French  
U.S. Department of Energy  
P.O. Box 550, MSIN: A6-54  
Richland, Washington 99352

Ms. Mary Delozier  
Lockheed Martin Hanford Corporation  
P.O. Box 1500, MSIN: H7-07  
Richland, Washington 99352

**RECEIVED**  
JUN 19 2000

**EDMC**

Dear Mr. French and Ms. Delozier:

Re: Completion of Corrective Measure #3 per July 8, 1998, SY Tank Farm Notice of Correction

The Washington State Department of Ecology (Ecology) performed a dangerous waste compliance inspection of the SY Double-shelled Tank (DST) Farm on March 28, 1998. This inspection resulted in five (5) violations of Chapter 40, Code of Federal Regulations (CFR), as referenced by Washington Administrative Code (WAC) Chapter 173-303, Dangerous Waste Regulations. Ecology issued a Notice of Correction to the U.S. Department of Energy (USDOE), Fluor Daniel Hanford Company (FDH), and Lockheed Martin Hanford Corporation (LMHC) on July 8, 1998, describing corrective measures for voluntary resolution corresponding to each of the violations revealed during the March 28, 1998, inspection. Four (4) of the five (5) violations cited in Ecology's July 8, 1998, Notice of Correction have been resolved.

The remaining violation, failure to operate the secondary containment of double-shelled tanks to remove waste within 24-hours or in as timely a manner as possible, remains open. However, Ecology is pleased to report that substantial progress has been made by USDOE and its contractors to complete this outstanding compliance issue.

Ecology has received revision 2 of the Double-Shell Tank Emergency Pumping Guide (HNF-3484, Rev. 2) which has been collaboratively developed between Ecology, USDOE, and its contractors. This emergency pumping guide reflects the findings from a Time Deployment Study attached to USDOE's October 30, 1999, letter to Ecology regarding options for pumping waste from the annuli of double-shell tanks. Completion of this emergency pumping guide, along with procurement and readiness to deploy the pumping equipment required by the

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emergency pumping guide, will closeout the outstanding violation from Ecology's March 28, 1998, inspection at the SY Tank Farm. In order to closeout the SY Tank Farm inspection, the following actions must be completed:

1. By July 31, 2000, USDOE must submit a schedule to Ecology describing removal of the original annulus pumps by March 31, 2001, from the double-shell tanks in which they are installed. Greater environmental benefit and use of existing funding would be achieved by removing the existing annulus pumps from the double-shell tanks in which they were originally installed in lieu of completing Phase II of the Time Deployment Study. Further savings would be realized if these existing pumps were removed while relatively uncontaminated from any waste accumulation that may occur in the annuli of the double-shell tanks.

This schedule must include a provision for revising section 3.6 and related sections of the Double-Shell Tank Emergency Pumping Guide to reflect the time required to start pumping liquids from the annulus of a double-shell tank once the annular pumps have been removed. This revision to the Double-Shell Tank Emergency Pumping Guide must be re-issued to Ecology as revision 3 within sixty (60) days of removal of all existing annulus pumps.

2. By July 31, 2000, Ecology must be notified of USDOE's receipt, acceptance, and readiness to deploy new double-shell tank annulus pumping equipment.

Please be advised that Ecology considers preparedness to remove liquids from DST secondary containment an open violation until all the actions described above are complete. In the interim, regarding preparedness to pump liquids from secondary containment, the DSTs shall be operated to HNF-3484, Rev. 2.

If you have any questions regarding this letter, please feel free to contact me at (509) 736-3031.

Sincerely,



Bob Wilson  
Nuclear Waste Program

BW:sb

cc: Steven Wisness, USDOE  
Dana Bryson, USDOE  
Phil Miller, CHG

Mary Lou Blazek, OOE  
Administrative Record: DST & 204-AR